

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**RACHEL RAMSBOTTOM, ET AL.,**  
**Plaintiffs,**

**v.**

**LORIN ASHTON,**  
**Defendant.**

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**Civil No. 3:21-cv-00272**

**JUDGE TRAUGER**

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**UNOPPOSED MOTION FOR LEAVE TO FILE  
MOTION IN LIMINE NO. 12 UNDER SEAL**

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Come now the Defendant, Lorin Ashton, and respectfully submits this Motion for leave to file his Motion in Limine No. 12 under seal. In support of this Motion, Mr. Ashton states as follows:

1. The “Administrative Practices and Procedures for Electronic Case Filing (ECF)” adopted by this Court in Administrative Order #167 at Section 5.07 requires a party seeking to file documents under seal to electronically file a Motion for Leave of Court to do so.
2. Motion in Limine No. 12 with Incorporated Memorandum of Law to Exclude the two exhibits on Plaintiffs’ preliminary exhibit list – P-376 (“Letter”) and P-183 (“an iPhone note from phone of Jenna Houston”) are attached thereto as Exhibits A and B, respectively.
3. Defendant objects to these two exhibits attached to Motion in Limine No. 12, which appear to be correspondence from non-parties, as irrelevant and prejudicial. Motion in Limine No. 12 analyzes information that would be determinantal to the parties’ ability to secure a fair trial if media sources were to publicize the information contained in the motion and prospective jurors were to encounter it. For these reasons, Mr. Ashton’s Motion in Limine

No. 12 with Incorporated Memorandum of Law and supporting exhibits should be maintained under seal.

4. Plaintiffs' counsel does not oppose the filing of confidential information under seal.

**WHEREFORE**, based on the foregoing, Mr. Ashton respectfully requests that this Honorable Court grant this Motion.

Respectfully Submitted,

/s/ Kimberly S. Hodde  
Kimberly S. Hodde, Esq. (No. 20128)  
HODDE & ASSOCIATES  
40 Music Square East  
Nashville, TN 37203  
(615) 242-4200

*Counsel for Defendant Lorin Ashton*

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and exact copy of the foregoing was served on all parties of record via the Court's CM/ECF system on this 30th day of December, 2024.

/s/ Kimberly S. Hodde  
Kimberly S. Hodde